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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ORIYOMI SADIQ ALOBA, aka "D Rwal Me Dontry," aka "davisdan0007," VICTOR ADEDAMOLA, aka "Legendowski," RIDWAN ALAGBADA, aka "Mr. Hottie Hottie," FNU LNU, aka "Ionicle," ROBERT CHARLES NICHOLSON, III, aka "Million\$Menace,"

Defendants.

CR No. 18-0083 (A) -RGK

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[18 U.S.C. § 1349: Conspiracy to Commit Wire Fraud and Attempted Wire Fraud; 18 U.S.C. § 1343: Wire Fraud; 18 U.S.C. § 1030(a)(2)(C), (c)(2)(B)(i), (ii): Unauthorized Access to a Protected Computer to Obtain Information; 18 U.S.C. § 1030(a)(5)(A), (c)(4)(B)(i), (c) (4) (A) (i) (I): Unauthorized Impairment of a Protected Computer; 18 U.S.C. § 1028A: Aggravated Identity Theft; 18 U.S.C. § 2(a): Aiding and Abetting]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS AND DEFINITIONS

1. Phishing is the fraudulent practice of sending emails purporting to be from a reputable or familiar source, such as a financial institution, social media company, or internet service

provider, to victims in order to induce the victims to reveal sensitive information, such as: names, addresses, Social Security numbers, dates of birth, and mothers' maiden names (collectively, "PII"); email usernames and passwords (collectively, "email credentials"); and credit and debit card information, including account numbers, expiration dates, credit verification values, and online account login and password information (collectively, "credit card information"). In a typical phishing scheme, the phishing email contains a link to a website that purports to be a legitimate business website but is, in fact, operated by a computer attacker. The website prompts the victim to enter his or her PII, email credentials, and/or credit card information, which is then collected and delivered to an email account belonging to the computer attacker ("harvester email account").

- 2. A phishing kit is a collection of software tools designed to enable phishing attacks. Phishing kits typically include website development software that can be used to create phishing websites and spamming software that allows users to automate the process of mass mailing phishing emails. The email address for the harvester email account is usually encoded in the software that creates the phishing website so that the stolen PII, email credentials, and credit card information is automatically delivered to the harvester email account every time a victim inputs that information into the phishing website.
- 3. Mobile payment and digital wallet services ("digital wallets") allow users to make credit and debit card purchases at certain retail stores using a smartphone rather than a physical card. To use a digital wallet, a user must do the following:

- a. First, the user enters certain credit card information into a digital wallet application, such as Apple Pay or Android Pay.
- b. Then, in a process referred to as dual-factor or two-factor identification, the application offers the user multiple options for receiving a verification code with which the application confirms that the user is the true account holder. Verification code delivery options typically include: (1) sending an email to the account holder's email account; (2) sending a text message to the account holder's cell phone; or (3) making a call to the account holder's phone number.
- c. Once in possession of the verification code, the user inputs it into the digital wallet application. Once the code has been accepted, the user can make purchases with his or her smartphone.
 - 4. At all times relevant to this indictment:
- a. Realmangreat@gmail.com (the "Realmangreat Account") and yalobaz@yahoo.com (the "Yalobaz Account") were email accounts belonging to defendant ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan0007" ("ALOBA").
- b. Microsoft Corporation ("Microsoft"), located in Redmond, Washington, operated computers used by subscribers all over the world in interstate and foreign commerce and communications. One of the services that Microsoft provided to its customers was Office 365, an internet- or "cloud"-based computing system in which customer computing, software, and data storage (including email data) were located and managed remotely on servers owned by Microsoft.
- c. The Los Angeles Superior Court ("LASC"), located in Los Angeles County, within the Central District of California, used

Office 365 to host its employee email accounts, which have the domain "lacourt.org." LASC employees accessed their email accounts using unique usernames and passwords.

- d. Victims M.P., R.H., R.I., M.C., and P.N. were LASC employees.
- e. Emails sent from LASC employee email accounts were transmitted through Microsoft servers located in California, Iowa, Virginia, Washington, and Wyoming, among other locations.
- f. American Express processed all credit card charges made in the western United States by wire through a server in Phoenix, Arizona.
- g. Bank of America, N.A. ("Bank of America") processed all credit card charges by wire through a server in Richardson, Texas.

COUNT ONE

[18 U.S.C. § 1349]

5. The Grand Jury realleges and incorporates herein by reference the Introductory Allegations and Definitions of this First Superseding Indictment, as though fully set forth herein.

I. OBJECTS OF THE CONSPIRACY

6. Beginning on a date unknown to the Grand Jury and continuing until on or about August 1, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants ALOBA, VICTOR ADEDAMOLA, aka "Legendowski" ("ADEDAMOLA"), RIDWAN ALAGBADA, aka "Mr. Hottie Hottie" ("ALAGBADA"), First Name Unknown ("FNU") Last Name Unknown ("LNU"), aka "Ionicle" ("Ionicle"), and ROBERT CHARLES NICHOLSON, III, aka "Million\$Menace" ("NICHOLSON"), together with others known and unknown to the Grand Jury, knowingly combined, conspired, and agreed with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

II. THE MANNER AND MEANS OF THE CONSPIRACY

- 7. The object of the conspiracy was carried out, and was to be carried out, in substance, as follows:
- a. Defendants ADEDAMOLA, ALAGBADA, and Ionicle would make and obtain phishing kits. In particular:
- i. Defendant ADEDAMOLA made and obtained a phishing kit (the "Office 365 phishing kit") designed to create a phishing website (the "Office 365 phishing website") that purported to be a website for Office 365 but was, in fact, a fraudulent website designed to collect victim email credentials and deliver them to the Realmangreat Account. The Office 365 phishing kit was also designed to send copies of an email (the "Office 365 phishing email") to

victims that purported to be a communication from Microsoft but was, in fact, a fraudulent email intended to lure victims to the Office 365 phishing website.

ii. Defendant ALAGBADA made and obtained a phishing kit (the "Dropbox phishing kit") designed to create a phishing website (the "Dropbox phishing website") that purported to be a website for Dropbox Business but was, in fact, a fraudulent website designed to collect victim email credentials and deliver them to the Realmangreat Account. The Dropbox phishing kit was also designed to send copies of an email (the "Dropbox phishing email") to victims that purported to be a communication from Dropbox Business but that was, in fact, a fraudulent email intended to lure victims to the Dropbox phishing website.

"American Express phishing kit") designed to create a phishing website (the "American Express phishing website") that purported to be a website for American Express but that was, in fact, a fraudulent website designed to collect victim email credentials and deliver them to the Realmangreat Account. The American Express phishing kit was also designed to send copies of an email (the "American Express phishing email") to victims that purported to be a communication from American Express but that was, in fact, a fraudulent email intended to lure victims to the American Express phishing website.

- b. Defendants ADEDAMOLA, ALAGBADA, and Ionicle would provide phishing kits to defendant ALOBA.
- c. Defendants ADEDAMOLA, ALAGBADA, and Ionicle would help defendant ALOBA use the phishing kits to obtain victim PII, email

credentials, and credit card information and deliver it to the Realmangreat Account.

- d. Defendant ALOBA would possess stolen victim PII, email credentials, and credit card information in the Realmangreat Account.
- e. Defendant ALOBA would use stolen email credentials obtained by phishing to log into victim email accounts without authorization in order to:
- i. send phishing emails and test emails to himself at the Yalobaz Account to test his access to the victims' email accounts; and
 - ii. send phishing emails to other victims.
- f. Defendant ALOBA would provide defendant NICHOLSON, and others known and unknown to the Grand Jury, with victim PII and credit card information obtained by phishing.
- g. Defendants ALOBA and NICHOLSON would add victim credit card information to digital wallets without authorization, as follows:
- i. Defendant NICHOLSON would input the victim credit card information into a digital wallet application;
- ii. At defendant ALOBA's direction, defendant NICHOLSON would select the option to receive the verification code by email;
- iii. Defendant ALOBA would log into the victim email account without authorization, obtain the verification code, and provide it to defendant NICHOLSON; and
- iv. Defendant NICHOLSON would input the verification code into the digital wallet application.

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h. Defendant NICHOLSON would use and attempt to use the digital wallet containing victims' credit card information to purchase and attempt to purchase goods at retail stores that he would later sell and remit a portion of the proceeds to defendant ALOBA.

III. OVERT ACTS

- 8. In furtherance of the conspiracy and to accomplish its objects, defendants ALOBA, ADEDAMOLA, ALAGBADA, Ionicle, and NICHOLSON, together with other co-conspirators known and unknown to the Grand Jury, on or about the dates set forth below, committed and willfully caused others to commit the following overt acts, among others, within the Central District of California and elsewhere:
- A. April 30, 2017 Unauthorized Use of Victim M.M.'s American

 Express Credit Card (Defendants ALOBA and NICHOLSON)

Overt Act No. 1: On or about April 30, 2017, by instant message, defendant NICHOLSON told defendant ALOBA that he was in California and "ready to go."

Overt Act No. 2: On or about April 30, 2017, by instant message, defendant ALOBA told defendant NICHOLSON that he had a credit card for defendant NICHOLSON to add to his digital wallet.

Overt Act No. 3: On or about April 30, 2017, by instant message, defendant ALOBA provided defendant NICHOLSON with victim M.M.'s name and address, and credit card information for M.M.'s American Express credit card ending in 6000 (the "M.M. American Express card").

Overt Act No. 4: On or about April 30, 2017, by instant message, defendant NICHOLSON sent defendant ALOBA a photo of a Samsung phone on whose screen was displayed options for receiving a digital wallet verification code.

Overt Act No. 5: On or about April 30, 2017, by instant 1 message, defendant ALOBA told defendant NICHOLSON to choose the email 2 option. 3 Overt Act No. 6: On or about April 30, 2017, by instant 4 5 message, defendant ALOBA told defendant NICHOLSON that he had not received the verification code and told defendant NICHOLSON to use a 6 different phone. 7 Overt Act No. 7: On or about April 30, 2017, by instant 8 message, defendant NICHOLSON told defendant ALOBA that he had a new 9 phone. 10 Overt Act No. 8: On or about April 30, 2017, by instant 11 message, defendant ALOBA sent defendant NICHOLSON a verification 12 code. 13 Overt Act No. 9: On or about April 30, 2017, by instant 14 message, defendant NICHOLSON told defendant ALOBA that he was going 15 to try to buy two iPhones at Best Buy for \$1,900. 16 On or about April 30, 2017, by instant Overt Act No. 10: 17 message, defendant NICHOLSON told defendant ALOBA that the purchase 18 19 was declined. Overt Act No. 11: On or about April 30, 2017, by instant 20 message, defendant ALOBA told defendant NICHOLSON that a \$2,000 21 purchase was now pre-authorized. 22 Overt Act No. 12: On or about April 30, 2017, by instant 23 message, defendant NICHOLSON told defendant ALOBA that the purchase 24 of the iPhones was declined again. 25 On or about April 30, 2017, defendant ALOBA Overt Act No. 13: 26

called American Express about the M.M. American Express card.

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Overt Act No. 14: On or about April 30, 2017, at a GameStop in La Verne, California, defendant NICHOLSON used the M.M. American Express card to purchase video game consoles, gift cards, and other items collectively worth approximately \$2,045.

Overt Act No. 15: On or about April 30, 2017, by instant message, defendant NICHOLSON confirmed to defendant ALOBA that the M.M. American Express card worked for three transactions for \$698, \$784, and \$562.

Overt Act No. 16: On or about April 30, 2017, by instant message, defendant NICHOLSON asked defendant ALOBA for his Bitcoin address so that he could pay defendant ALOBA his share of the proceeds.

B. May 4, 2017 Attempted Use of Victim G.F.'s Bank of America Credit Card (Defendants ALOBA and NICHOLSON)

Overt Act No. 17: On or about May 4, 2017, defendant ALOBA received three emails in the Realmangreat Account from a phishing website containing victim G.F.'s PII, email credentials, and credit card information for G.F.'s Bank of America credit card ending in 4827 (the "G.F. Bank of America card").

Overt Act No. 18: On or about May 4, 2017, by instant message, defendant ALOBA told defendant NICHOLSON that he had new victim credit card information and asked if NICHOLSON was ready to use it.

Overt Act No. 19: On or about May 4, 2017, by instant message, defendant ALOBA sent defendant NICHOLSON victim G.F.'s PII and the G.F. Bank of America card information.

Overt Act No. 20: On or about May 4, 2017, by instant message, defendant NICHOLSON sent defendant ALOBA a photo of a Samsung phone

on whose screen was displayed options for receiving a digital wallet verification code.

Overt Act No. 21: On or about May 4, 2017, by instant message, defendant ALOBA told defendant NICHOLSON to choose the email option.

Overt Act No. 22: On or about May 4, 2017, by instant message, defendant ALOBA sent defendant NICHOLSON a verification code.

Overt Act No. 23: On or about May 4, 2017, at a Macy's in Topanga Canyon, defendant NICHOLSON made three attempts to purchase items collectively worth approximately \$1,735.

Overt Act No. 24: On or about May 4, 2017, by instant message, defendant NICHOLSON told defendant ALOBA that the Macy's purchase was declined and asked defendant ALOBA to contact the bank.

Overt Act No. 25: On or about May 4, 2017, by instant message, defendant ALOBA told defendant NICHOLSON that the G.F. Bank of America card was "good" and that he was on the phone with Bank of America confirming the available balance on the G.F. Bank of America card.

Overt Act No. 26: On or about May 4, 2017, by instant message, defendant NICHOLSON sent defendant ALOBA a photo of a phone on whose screen was displayed account information for the G.F. Bank of America card showing that a charge for approximately \$1,735 had been declined three times.

Overt Act No. 27: On or about May 4, 2017, by instant message, defendant ALOBA told defendant NICHOLSON that he had called the bank and learned that the G.F. Bank of America card was no longer working.

C. May 31, 2017 Office 365 Phishing Email to Victim M.P. (Defendants ALOBA and ADEDAMOLA)

Overt Act No. 28: On an unknown date, defendant ALOBA obtained the email credentials for victim K's email account, [victimK]@cox.net.

Overt Act No. 29: On or about May 22, 2017, using victim K's email credentials, defendant ALOBA logged into the [victimK]@cox.net email account without authorization and sent a test email to himself at the Yalobaz Account.

Overt Act No. 30: On or about May 30, 2017, by instant message, defendant ALOBA asked defendant ADEDAMOLA to send him the Office 365 phishing kit.

Overt Act No. 31: On or about May 30, 2017, by instant message, defendant ADEDAMOLA sent defendant ALOBA the Office 365 phishing kit that defendant ADEDAMOLA had encrypted to avoid detection, and advised defendant ALOBA how to use it.

Overt Act No. 32: On or about May 31, 2017, using victim K's email credentials, defendant ALOBA logged into the [victimK]@cox.net email account without authorization and sent the Office 365 phishing email to victim M.P. at her LASC email address.

Overt Act No. 33: On or about May 31, 2017, by instant message, defendant ALOBA confirmed to defendant ADEDAMOLA that defendant ALOBA was able to send out 8,000 Office 365 phishing emails.

Overt Act No. 34: On or about May 31, 2017, by instant message, defendant ALOBA sent victim M.P.'s LASC email credentials to defendant ADEDAMOLA.

D. July 21, 2017 Distribution of the Dropbox Phishing Email (Defendants ALOBA and ALAGBADA)

Overt Act No. 35: On or about July 20, 2017, by instant message, defendant ALAGBADA sent defendant ALOBA a screenshot of a harvester email account for the Dropbox phishing kit.

Overt Act No. 36: On or about July 20, 2017, by instant message, defendant ALOBA asked defendant ALAGBADA to send the content of the Dropbox phishing email to the Realmangreat and the Yalobaz Accounts.

Overt Act No. 37: On or about July 21, 2017, by instant message, defendant ALAGBADA sent defendant ALOBA the Dropbox phishing kit.

Overt Act No. 38: On or about July 21, 2017, by instant message, defendant ALAGBADA explained to defendant ALOBA how to access a user's contacts in Office 365.

Overt Act No. 39: On or about July 21, 2017, using victim M.P.'s LASC email credentials, defendant ALOBA logged into the [victimMP]@lacourts.org email account without authorization.

Overt Act No. 40: On or about July 21, 2017, by instant message, defendant ALOBA told defendant ALAGBADA that defendant ALOBA had accessed a victim's contacts and was going to send phishing emails from the victim's mailbox.

Overt Act No. 41: On or about July 21, 2017, without authorization, defendant ALOBA sent the Dropbox phishing email from [victimMP]@lacourt.org to approximately 550 LASC employees.

E. July 24 to 26, 2017 Distribution of the American Express Phishing Email (Defendants ALOBA and IONICLE)

Overt Act No. 42: On or about July 20, 2017, by instant message, defendant Ionicle sent defendant ALOBA a zip file named "All_Pages.zip" that contained approximately 17 phishing kits, including the American Express phishing kit.

Overt Act No. 43: On or about July 21, 2017, in the

Realmangreat Account, defendant ALOBA possessed the LASC email

credentials of approximately 127 LASC employees that had been

harvested from the Dropbox phishing website, including victims R.H.,

R.I., P.N., and M.C.

Overt Act No. 44: On or about July 24, 2017, using victim R.H.'s LASC email credentials, defendant ALOBA logged into the [victimRH]@lacourts.org email account without authorization.

Overt Act No. 45: On or about July 24, 2017, without authorization, defendant ALOBA sent the American Express phishing email from [victimRH]@lacourts.org to [victimRF]@uml.edu.

Overt Act No. 46: On or about July 24, 2017, without authorization, defendant ALOBA sent the American Express phishing email from [victimRH]@lacourts.org to [victimG]@webstationinc.com.

Overt Act No. 47: On or about July 24, 2017, without authorization, defendant ALOBA sent the American Express phishing email from [victimRH]@lacourts.org to [victimGI]@lgsinnovations.com.

Overt Act No. 48: On or about July 24, 2017, using victim R.I.'s LASC email credentials, defendant ALOBA logged into the [victimRI]@lacourts.org email account without authorization.

Overt Act No. 49: On or about July 25, 2017, without 1 2 authorization, defendant ALOBA sent a test email from [victimRI]@lacourts.org to himself at the Yalobaz Account. 3 Overt Act No. 50: On or about July 25, 2017, without 4 authorization, defendant ALOBA sent the American Express phishing 5 email from [victimRI]@lacourts.org to himself at the Yalobaz Account. 6 On or about July 25, 2017, without 7 Overt Act No. 51: authorization, defendant ALOBA sent the American Express phishing 8 email from [victimRI]@lacourts.org to [victimAB]@columbia.edu. 9 On or about July 25, 2017, without Overt Act No. 52: 10 authorization, defendant ALOBA sent the American Express phishing 11 email from [victimRI]@lacourts.org to [victimAC]@co.collins.tx.us. 12 On or about July 25, 2017, without 13 Overt Act No. 53: authorization, defendant ALOBA sent the American Express phishing 14 email from [victimRI]@lacourts.org to [victimA]@etonbio.com. 15 Overt Act No. 54: On or about July 25, 2017, without 16 authorization, defendant ALOBA sent the American Express phishing 17 email from [victimRI]@lacourts.org to [victimE]@yahoo.com 18 On or about July 24, 2017, using victim 19 Overt Act No. 55: P.N.'s LASC email credentials, defendant ALOBA logged into the 20 [victimPN]@lacourts.org email account without authorization. 21 On or about July 26, 2017, without 22 Overt Act No. 56: authorization, defendant ALOBA sent a test email from 23 [victimPN]@lacourts.org to himself at the Yalobaz Account. 24 Overt Act No. 57: On or about July 24, 2017, using victim 25 M.C.'s LASC email credentials, defendant ALOBA logged into the 26 27 [victimMC]@lacourts.org email account without authorization.

On or about July 26, 2017, without Overt Act No. 58: authorization, defendant ALOBA sent a test email from [victimMC]@lacourts.org to himself at the Yalobaz Account. Overt Act No. 59: On or about July 30, 2017, by instant message, defendant Ionicle demanded payment from defendant ALOBA for the 17 phishing kits in the "All Pages" file. Overt Act No. 60: On or about August 1, 2017, defendant ALOBA paid defendant Ionicle in Bitcoin for the 17 phishing kits.

COUNTS TWO THROUGH SEVENTEEN

[18 U.S.C. §§ 1349, 1343; 2(a)]

9. The Grand Jury repeats, re-alleges, and incorporates by reference the allegations set forth in paragraphs 1-4 and 7 of this First Superseding Indictment as if fully set forth herein.

I. SCHEME TO DEFRAUD

- 10. Beginning on a date unknown to the Grand Jury and continuing until on or about August 1, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants ALOBA, ADEDAMOLA, ALAGBADA, "Ionicle," and NICHOLSON, together with others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly and with intent to defraud, devised, participated in, and executed and attempted to execute a scheme to defraud victims as to material matters, and to obtain money and property from such victims by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.
- 11. The fraudulent scheme was operated and was carried out, in substance, as set forth in paragraph 7 of this First Superseding Indictment.

II. USE OF THE WIRES

12. On or about the following dates, within the Central District of California and elsewhere, defendants ALOBA, ALAGBADA, ADEDAMOLA, Ionicle, and NICHOLSON, and others known and unknown to the Grand Jury, for the purpose of executing and attempting to execute the above-described scheme to defraud, transmitted and caused the transmission of the following items by means of wire communication in interstate and foreign commerce:

COUNT	DATE	DEFENDANTS	ITEM WIRED
TWO	4/30/17	ALOBA NICHOLSON	\$734.99 charge on victim M.M.'s American Express card ending in 6000
THREE	4/30/17	ALOBA NICHOLSON	\$561.50 charge on victim M.M.'s American Express card ending in 6000
FOUR	4/30/17	ALOBA NICHOLSON	\$698.46 charge on victim M.M.'s American Express card ending in 6000
FIVE	5/4/17	ALOBA NICHOLSON	Attempted \$1,735.65 charge on victim G.F.'s Bank of America card ending in 4827
SIX	7/21/2017	ALOBA ADEDAMOLA ALAGBADA	Email from [VictimMP]@lacourts.org to [VictimRG]@lacourts.org
SEVEN	7/24/2017	ALOBA ALAGBADA Ionicle	Email from [victimRH]@lacourts.org to [victimRF]@uml.edu
EIGHT	7/24/2017	ALOBA ALAGBADA Ioncile	Email from [victimRH]@lacourts.org to [victimG]@webstationinc.com
NINE	7/24/2017	ALOBA ALAGBADA Ionicle	Email from [victimRH]@lacourts.org to [victimGI]@lgsinnovations.com
TEN	7/25/2017	ALOBA ALAGBADA	Email from [victimRI]@lacourts.org to yalobaz@yahoo.com
ELEVEN	7/25/2017	ALOBA ALAGBADA Ionicle	Email from [victimRI]@lacourts.org to yalobaz@yahoo.com
TWELVE	7/25/2017	ALOBA ALAGBADA Ionicle	Email from [victimRI]@lacourts.org to [victimAB]@columbia.edu
THIRTEEN	7/25/2017	ALOBA ALAGBADA Ionicle	Email from [victimRI]@lacourts.org to [victimAC]@co.collins.tx.us

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FOURTEEN	7/25/2017	ALOBA ALAGBADA Ionicle	Email from [victimRI]@lacourts.org to [victimA]@etonbio.com
FIFTEEN	7/25/2017	ALOBA ALAGBADA Ionicle	Email from [victimRI]@lacourts.org to [victimE]@yahoo.com
SIXTEEN	7/26/2017	ALOBA ALAGBADA	Email from [victimPN]@lacourts.org to yalobaz@yahoo.com
SEVENTEEN	7/26/2017	ALOBA ALAGBADA	Email from [victimMC]@lacourts.org to yalobaz@yahoo.com

COUNT EIGHTEEN

[18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), (c)(4)(A)(i)(I); 2(a)] On or about July 21, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007," VICTOR ADEDAMOLA, aka "Legendowski," and RIDWAN ALAGBADA, aka "Mr. Hottie Hottie," each aiding and abetting the other, knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally and without authorization caused damage by impairing the integrity and availability of data, a program, a system, and information on a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), that is, the email server(s) of Microsoft Corporation ("Microsoft") hosting the Los Angeles Superior Court email account of victim M.P., thereby causing a loss to Microsoft's email client, the Los Angeles Superior Court, aggregating at least \$5,000 in value during a one-year period beginning on or about July 21, 2017.

COUNT NINETEEN

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(i), (ii); 2(a)] On or about July 21, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007," and VICTOR ADEDAMOLA, aka "Legendowski," each aiding and abetting the other, intentionally accessed without authorization and in excess of authorization a computer, and thereby obtained information, namely, the contents of, level of access to, and security features associated with the Los Angeles Superior Court email account of victim M.P., from a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), that is, from the email server(s) of Microsoft Corporation, for the purpose of private financial gain and in furtherance of a criminal act, to wit, Wire Fraud, in violation of Title 18, United States Code, Section 1343, and Possession of 15 or More Unauthorized Access Devices, in violation of Title 18, United States Code, Section 1029(a)(3).

COUNT TWENTY

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(i), (ii); 2(a)] On or about July 24, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007," and RIDWAN ALAGBADA, aka "Mr. Hottie Hottie," each aiding and abetting the other, intentionally accessed without authorization and in excess of authorization a computer, and thereby obtained information, namely, the contents of, level of access to, and security features associated with the Los Angeles Superior Court email account of victim R.H., from a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), that is, from the email server(s) of Microsoft Corporation, for the purpose of private financial gain and in furtherance of a criminal act, to wit, Wire Fraud, in violation of Title 18, United States Code, Section 1343, and Possession of 15 or More Unauthorized Access Devices, in violation of Title 18, United States Code, Section 1029(a)(3).

COUNT TWENTY-ONE

[18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i), (c)(4)(A)(i)(I); 2(a)] On or about July 25, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007," RIDWAN ALAGBADA, aka "Mr. Hottie Hottie," and First Name Unknown ("FNU") Last Name Unknown ("LNU"), aka "Ionicle" ("Ionicle"), each aiding and abetting the other, knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally and without authorization caused damage by impairing the integrity and availability of data, a program, a system, and information on a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), that is, the email server(s) of Microsoft Corporation ("Microsoft") hosting the Los Angeles Superior Court email account of victim R.I., thereby causing a loss to Microsoft's email client, the Los Angeles Superior Court, aggregating at least \$5,000 in value during a one-year period beginning on or about July 25, 2017.

COUNT TWENTY-TWO

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(i), (ii); 2(a)] On or about July 25, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007," and RIDWAN ALAGBADA, aka "Mr. Hottie Hottie," each aiding and abetting the other, intentionally accessed without authorization and in excess of authorization a computer, and thereby obtained information, namely, the contents of, level of access to, and security features associated with the Los Angeles Superior Court email account of victim R.I., from a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), that is, from the email server(s) of Microsoft Corporation, for the purpose of private financial gain and in furtherance of a criminal act, to wit, Wire Fraud, in violation of Title 18, United States Code, Section 1343, and Possession of 15 or More Unauthorized Access Devices, in violation of Title 18, United States Code, Section 1029(a)(3).

COUNT TWENTY-THREE

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(i), (ii); 2(a)] On or about July 26, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007," and RIDWAN ALAGBADA, aka "Mr. Hottie Hottie," each aiding and abetting the other, intentionally accessed without authorization and in excess of authorization a computer, and thereby obtained information, namely, the contents of, level of access to, and security features associated with the Los Angeles Superior Court email account of victim P.N., from a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), that is, from the email server(s) of Microsoft Corporation, for the purpose of private financial gain and in furtherance of a criminal act, to wit, Wire Fraud, in violation of Title 18, United States Code, Section 1343, and Possession of 15 or More Unauthorized Access Devices, in violation of Title 18, United States Code, Section 1029(a)(3).

COUNT TWENTY-FOUR

[18 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(i), (ii); 2(a)] On or about July 26, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007," and RIDWAN ALAGBADA, aka "Mr. Hottie Hottie," each aiding and abetting the other, intentionally accessed without authorization and in excess of authorization a computer, and thereby obtained information, namely, the contents of, level of access to, and security features associated with the Los Angeles Superior Court email account of victim M.C., from a protected computer, as that term is defined in Title 18, United States Code, Section 1030(e)(2)(B), that is, from the email server(s) of Microsoft Corporation, for the purpose of private financial gain and in furtherance of a criminal act, to wit, Wire Fraud, in violation of Title 18, United States Code, Section 1343, and Possession of 15 or More Unauthorized Access Devices, in violation of Title 18, United States Code, Section 1029(a)(3).

COUNT TWENTY-FIVE

[18 U.S.C. §§ 1028A(a)(1); 2(a)]

On or about May 4, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007" ("ALOBA"), and ROBERT NICHOLSON, aka "Million\$Menace" ("NICHOLSON"), each aiding and abetting the other, knowingly possessed and used, without lawful authority, a means of identification that defendants ALOBA and NICHOLSON knew belonged to other persons, that is, the name, email username and password of victim G.F., during and in relation to the offense of Attempted Wire Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count Five of this First Superseding Indictment.

COUNT TWENTY-SIX

[18 U.S.C. §§ 1028A(a)(1); 2(a)]

On or about July 21, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007" ("ALOBA"), VICTOR ADEDAMOLA, aka "Legendowski" ("ADEDAMOLA"), and RIDWAN ALAGBADA, aka "Mr. Hottie Hottie" ("ALAGBADA"), each aiding and abetting the other, knowingly possessed and used, without lawful authority, a means of identification that defendants ALOBA, ADEDALOMA, and ALAGBADA knew belonged to another person, that is, the name, email username and password of victim M.P., during and in relation to the offense of Wire Fraud, a felony violation of Title 18, United States Code, Section 1343, as charged in Count Six of this First Superseding Indictment.

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COUNT TWENTY-SEVEN

[18 U.S.C. §§ 1028A(a)(1); 2(a)]

On or about July 24, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007" ("ALOBA"), and RIDWAN ALAGBADA, aka "Mr. Hottie Hottie" ("ALAGBADA"), each aiding and abetting the other, knowingly possessed and used, without lawful authority, a means of identification that defendants ALOBA and ALAGBADA knew belonged to another person, that is, the email username and password of victim R.H., during and in relation to the offense of Unauthorized Access to a Protected Computer to Obtain Information, a felony violation of Title 18, United States Code, Section 1030(a)(2)(C), (c)(2)(B)(i), (ii), as charged in Count Twenty of this First Superseding Indictment.

COUNT TWENTY-EIGHT

[18 U.S.C. §§ 1028A(a)(1); 2(a)]

On or about July 25, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant ORIYOMI SADIQ ALOBA, also known as ("aka") "D Rwal Me Dontry," aka "davisdan007" ("ALOBA"), RIDWAN ALAGBADA, aka "Mr. Hottie Hottie" ("ALAGBADA"), and First Name Unknown ("FNU") Last Name Unknown "(LNU"), aka "Ionicle" ("Ionicle"), each aiding and abetting the other, knowingly possessed and used, without lawful authority, a means of identification that defendants ALOBA, ALAGBADA, and "Ionicle" knew belonged to another person, that is, the email username and password of victim R.I., during and in relation to the

offense of Unauthorized Impairment of a Protected Computer, a felony 1 violation of Title 18, United States Code, Section 1030(a)(5)(A), 2 3 (c)(4)(B)(i),(c)(4)(A)(i)(I), as charged in Count Twenty-One of this First Superseding Indictment. 4 5 A TRUE BILL 6 7 8 9 10 NICOLA T. HANNA United States Attorney 11 12 PATRICK R. FITZGERALD 13 Assistant United States Attorney 14 Chief, National Security Division 15 RYAN WHITE Assistant United States Attorney 16 Chief, Cyber & Intellectual Property Crimes Section 17 18 JENNIE L. WANG Assistant United States Attorney 19 Deputy Chief, Cyber & Intellectual Property Crimes Section 20 ROBYN K. BACON 21 Assistant United States Attorney Cyber & Intellectual Property Crimes 22 Section 23 24 25

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